

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

GEEBO LLC d/b/a THE SOMERS HOUSE,

Plaintiff,

Case No. 2:19-cv-00175-PP

v.

VILLAGE OF SOMERS, *et al.*,

Defendants.

PLAINTIFF'S SECOND SET OF DOCUMENT REQUESTS

Plaintiff Geebo LLC d/b/a The Somers House ("Somers House"), by its counsel Davis & Kuelthau, s.c., serves these document requests on Defendants Village of Somers, Timothy Kitzman, and Jeffrey Davison, to be answered within 30 days as required by Fed. R. Civ. P. 34.

DOCUMENT REQUESTS

REQUEST NO. 1: Please produce all documents relating to the Village of Somers or its representatives drafting, adopting, or approving of Village code 12.15 governing "Cabaret Licenses," including but not limited to: all draft versions of the ordinance; all communications concerning drafting, adopting, approving the ordinance or any draft of the ordinance; all documents reviewed, compiled, relied upon, or otherwise consulted when drafting, adopting, approving the ordinance or any draft of the ordinance. This request also seeks all communications concerning this subject matter.

RESPONSE:

REQUEST NO. 2: Please produce all documents Defendants or members of the Village Board compiled, received, reviewed, relied upon, or consulted when assessing any application for a probationary or regular cabaret license from any establishment other than Somers House from 2015 through the present, including but not limited to any documents requested or obtained under Village

**Exhibit
D**

ordinance 12.15 and law enforcement reports or investigation documents. This request seeks all communications concerning this subject matter and relates to all decisions to grant or deny and whether to condition or not condition any probationary or regular cabaret ordinance.

RESPONSE:

Dated: August 7, 2020

Davis & Kuelthau, s.c.

By: *Electronically signed by Ryan M. Wiesner*
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